

## Your response

Question	Your response
<p><b>Question 1: Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to</b></p>	<p>Confidential? – N</p> <p>Our committee recognises the serious and growing extent of poverty amongst a substantial proportion of households. Spiralling living costs will only further exacerbate this problem. As we reach the end of the furlough period, we can only speculate on how things will develop, but one would be forgiven for expecting debt levels to increase and the extent of this problem to get worse.</p> <p>There is an opportunity here for Ofcom to show itself as a leader in this space of supporting consumers. It is not in the interests of providers for their customers not to be paying their bills and we believe that if they cannot see the benefits of offering an effective signposting service to help consumers deal with debt and assist them in finding ways to pay their bills, then Ofcom should be enabled to take a firm approach with such providers.</p> <p>Whilst most people recognise the scale of the challenges presented by the pandemic and the fallout from leaving the EU, there is nothing to be said that the coming year will not be every bit as challenging from a consumer perspective as the previous 18 months. In fact, as prices continue to soar and accessing goods/services becomes an increasingly difficult challenge for many, there are reasons to be concerned at the scale of the problems facing us. It is clear that this problem will continue to get worse before it gets better.</p> <p>Whilst we recognise that these problems are not caused by communications provider, we believe that the proposed amendments to the guide are proportionate and would offer consumers greater access to help and support. That being said, we would like to see stronger and more proactive action being taken by Ofcom to get providers to the space where they need to be in dealing with situations of this nature.</p>

We very much support the introduction of social tariffs by a number of broadband providers and believe these should be extended across the industry. We are, however, disappointed that social tariffs do not offer deeper discounts, which may, in part, explain low take up. Much improved promotion of social tariffs and other measures to support consumers on low incomes is also vital. We believe that the extent and impact of help offered voluntarily by providers is an important consideration for deciding if further regulation is required.

Across providers, there appears to be differing qualifying criteria to access these social tariffs and if the rollout of these social tariffs is not going to become compulsory, then perhaps Ofcom could develop guidance for providers that are offering them in ordering to provide consistency of approach across the sector and to enable consumers to more easily access such services.

Accessing effective, reliable and affordable communications services can now be considered an essential service, on a par with power, gas, water, etc. Therefore, the rules governing consumer support and issues surrounding debt should be consistent across all these sectors.

We believe that in order to make these proposed changes effective, there is a need for the enforcement of all current and future rules and that appropriate and effective action is taken by Ofcom to tackle problem providers and to ensure that consumers are receiving access to adequate levels of support, advice and assistance when they experience payment problems or debt.

We also believe that the risk of being cut off as a final outcome needs to be mitigated for those with children in education - and that string consideration should be given to a "window" of access for educational use of broadband. The telecoms providers need to be encouraged to do all they can to mitigate the digital divide.

From our perspective, we note the particular challenges of NI – i.e. the lowest levels of

	<p>disposable income in the UK (£143 weekly discretionary income compared with the UK average of £246); also a third of households have reported a drop in income since the pandemic; and social security benefits make up a higher proportion of income for lowest quartile, all of which make this an area of interest for our committee.</p> <p>Given the importance of information to support consumers in financial distress, any help should be prominent and easy to access for all; there should be dedicated contact channels by different means, consumers should be able to choose the channel that suits them, and they should be staffed by employees who are specially trained including in working with vulnerable groups. Also, that signposting advisory agencies should be routine, prominent and across all communications with people who require or may require support – and we think that might be something that can be put in the general conditions. We also believe that there should be a dedicated helpline for organisations that provide support, advice and signposting for consumers.</p> <p>As a final point, while we support the strengthening of the guide as suggested, we think Ofcom should be considering a more rules-based approach in areas where the voluntary approach is not having sufficient impact; and further making the point that timely intervention is crucial given the current economic context and how we can expect this to develop over next few years.</p>
<p><b>Question 2: Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to.</b></p>	<p>Confidential? – N</p> <p>Question 2 is the same as Question 1.</p>
<p><b>Question 3: Do you agree that there should be more consistency in the way in which providers seek to effect payment from customers in debt? If so, how do you believe this could be achieved most effectively? Please</b></p>	<p>Confidential? – N</p> <p>We strongly agree with the proposal to tackle the inconsistency of approach across the sector by having common standards across all</p>

<p><b>provide evidence supporting your views, including any research you have conducted or have access to</b></p>	<p>communications providers. This should also include a clear statement specifying the rules around dealing with consumer debt. Those providers who are providing the most help and support to consumers should be recognised and used as an example to encourage other providers to improve their conduct in this area.</p> <p>We have found that the extent and nature of communication with those that are facing disconnection across the sector varies from provider to provider, with no consistency of approach and for this reason, the consumer has no idea what to expect from their provider. Seeking the standardisation of such communication/action across the sector would be a worthwhile exercise for Ofcom to take forward and would have a lasting impact on consumers.</p> <p>We have found that small and micro enterprises comprise a substantial of our local economy and that many of them are struggling and will also need additional support, protection and consistency from their communications provider and the regulator in this regard.</p> <p>We believe that consumers should be empowered to leave their current provider without any penalties for breach of contract if a social tariff is not available to them.</p>
<p><b>Question 4: Do you agree that we should amend the guide regarding the provision of information about measures to support customers? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to.</b></p>	<p>Confidential? – N</p> <p>We agree that the guide should be amended to enhance the levels of support and advice provided to consumers who are struggling with debt and paying their bills. We believe that consumers should be empowered to leave their current provider without any penalties for breach of contract if help is not offered to the standard set in the guide.</p>

Please complete this form in full and return to [debt.review@ofcom.org.uk](mailto:debt.review@ofcom.org.uk).